

**EAGLE TELEPHONE SYSTEM, INC.
d/b/a SNAKE RIVER PCS
P.O. Box 178
109 Main Street
Richland, OR 97870**

May 19, 2005

Via Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Third Semi-Annual Report
WT Docket No. 01-309
HAC Digital Wireless Telephones

Dear Ms. Dortch:

Eagle Telephone System, Inc., d/b/a Snake River PCS (“Eagle”), hereby files its third semi-annual report in response to the Commission’s Hearing Aid Compatibility *Report and Order*.¹

As background, Eagle is a small, rural wireless carrier licensed to operate a commercial wireless network on various disaggregated frequencies in portions of Baker County, Oregon, Union County, Oregon and Wallowa County, Oregon pursuant to three broadband Personal Communications Services (“PCS”) licenses.² Eagle acquired these licenses on December 13, 2000, June 15, 2001 and May 24, 2002, respectively, and launched commercial operations on September 27, 2001. As of this writing, Eagle has approximately 500 subscribers.

Eagle is part of a consortium of small, rural PCS licensees in Oregon and Idaho conducting business under the “Snake River PCS” brand name. As a member of the consortium, Eagle has agreed to purchase all of its handsets directly from Farmers Mutual Telephone Company (“Farmers”), another member of the consortium. As such, Eagle has limited ability to influence product development or selection, and must rely instead on the range of commercially available products purchased by the consortium. At

¹ Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, Report and Order, 18 FCC Rcd 16753 (2003).

² See Call Signs WPQT670, WPQS784 and WPUK735.

present, Eagle sells the following makes (and models) of digital CDMA wireless handsets: Audiovox (model 8910); Kyocera (models 414, 424, 434, 2135, 2235, 2325, 5135, 7135, SE444 and S14); LG (model VX400); and Motorola (models 343, T720, T731 and V60s). To its knowledge, none of these phones meets a U3 rating under ANSI Standard C63.19. However, Eagle does offer hands-free neck loop accessories to allow for conversation by users with telecoil-compatible hearing aids. Moreover, Farmers reports that Kyocera has informed it that all of the handsets referenced above meet the Commission's hearing aid compatibility requirements.³

In the light of the foregoing, Eagle hereby reports the following in response to Commission requirements:

- **Item 1 – Digital Wireless Phones Tested:** Eagle is not a manufacturer, and does not purchase phones directly from vendors. Hence, to date, Eagle has not tested any digital wireless telephones for HAC-compliance.
- **Item 2 – Laboratory Used:** None. *See* Response to Item 1.
- **Item 3 – Test Results for Each Phone Tested:** Not applicable. *See* Response to Item 1.
- **Item 4 – Identification of Compliant Phone Models and Ratings According to ANSI C63.19:** To Eagle's knowledge, none of the handsets it sells meets a U3 rating under ANSI Standard C63.19.
- **Item 5 – Report on the Status of Product Labeling:** None. It is anticipated that product labeling will be handled by the consortium's handset vendors.
- **Item 6 – Report on Outreach Efforts:** Eagle works with hearing impaired customers to select a phone most suitable to their needs. Eagle will continue and expand these efforts once phones meeting the U3 rating under ANSI standard C63.19 become commercially available.
- **Item 7 – Information Related to Retail Availability of Compliant Phones:** Eagle is unaware of any commercially available CDMA handset model that meets the U3 rating under ANSI Standard C63.19.
- **Item 8 – Information Related to Incorporating Hearing Aid Compatibility Features Into Newer Models of Digital Wireless**

³ *See* Farmers Mutual Telephone Hearing Aid Compatibility Report, WT Docket No. 01-309 (May 17, 2005).

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Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the manufacturers of CDMA handsets.

- **Item 9 -- Any Activities Related to ANSI C63.19 or Other Standard Intended to Promote Compliance with the Requirements of the Commission's *Report and Order*:** None.
- **Item 10 – Total Numbers of Complaint and Non-Compliant Phone Models Offered as of the Date of this Report:** As referenced above, Eagle currently sells wired variety of wireless phones. To its knowledge, none of these meet a U3 rating under ANSI Standard C63.19.
- **Item 11 – Any Ongoing Efforts for Interoperability Testing With Hearing Aid Devices:** Eagle has performed no interoperability testing to date, but anticipates that such testing will be performed by the consortium's vendors as it readies HAC-compliant phones for marketing.

Respectfully submitted,

Eagle Telephone System, Inc.
d/b/a Snake River PCS

s/
Patrick A. Lattin,
General Manager